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## REMARKS

In the Office Action of July 18, 2006, claims 1-5, 7 and 8 were rejected under 35 USC 102(b) as being anticipated by Kisor et al. (EP 0683599A1).

The rejections under 35 USC 102(b) are respectfully traversed since Kisor et al. does not disclose each and every limitation of claims 1-5, 7 and 8.

Kisor et al. states at page 1:

A dithered bilevel image file 68 is first compressed by analyzing blocks of pixels and counting the number of pixels that are turned on and represent a monochrome color (e.g., black). A compressed file 72 is created containing block pixel counts for all blocks in the dithered bilevel image file. Subsequently, the block pixel count file is decompressed 108 by using the block pixel counts for all of the blocks to randomly select predetermined block pixel patterns from a plurality of pixel pattern sets 110. Each pattern set includes a plurality of different block pixel patterns that present a range of different grey tone levels ranging from completely black to completely white. The pattern sets are used to create a transformed bit mapped image file 112 that can then be printed or displayed.

Kisor et al. thus generally teaches compression/decompression of half-toned images, wherein decompression is performed "by using the block pixel counts for all of the blocks to randomly select predetermined block pixel patterns from a plurality of pixel pattern sets 110". "Once a particular set has been randomly selected, the block pixel count number is used to select a particular pattern that has the same or nearly the same number of black pixels". (Col. 11/35-11/38).

This is different from the claimed method of detecting a portion of a half-toned uniform area in a half-toned bit-map. Kisor et al. generates a half-toned image by using

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pixel count to select a pixel pattern for the portion of the uncompressed image represented by the particular pixel count. Nothing in Kisor et al. teaches comparing an N-pixel tile to a corresponding specifically defined N-pixel reference tile for purposes of determining whether the N-pixel tile comprises a portion of a half-toned uniform region, and the office action has not demonstrated that Kisor et al. discloses such comparison.

More particularly, Kisor et al. does not teach or suggest the claimed combinations, including for example:

> comparing each N-pixel tile to a corresponding N-pixel reference tile that comprises a half-toned binary pattern that would be produced by the predetermined half-toning procedure for such N-pixel tile if the portion of a pre-half-toned data that resulted in such N-pixel tile were of uniform lightness;

> identifying an N-pixel tile as comprising a portion of a half-toned uniform region if it matches the corresponding N-pixel reference tile.

As to the contention in the Office Action that "the Office interprets the number of black pixels of Kisor et al. equivalent to the 'marked pixel count M' and the blocks of pixels of Kisor et al. equivalent to the 'plurality of N-pixel tiles' of Applicant's claims", it is respectfully submitted that Kisor et al. does not teach comparing each N-pixel tile to a corresponding N-pixel reference tile that comprises a half-toned binary pattern that would be produced by the predetermined half-toning procedure for such N-pixel tile if the portion of a pre-half-toned data that resulted in such N-pixel tile were of uniform lightness.

As to the contention in the office action that "the Office interprets such patterns of Kisor et al. functionally equivalent to the reference tiles since such patterns represent all possible regular viewing of gray colors by the human eye", it is respectfully submitted that the claims define an N-pixel reference tile as comprising a half-toned binary pattern

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that would be produced by the predetermined half-toning procedure for such N-pixel tile if the portion of a pre-half-toned data that resulted in such N-pixel tile were of uniform lightness. Kisor et al. does not teach such reference tiles.

As to the contention in the Office Action that "the Office interprets that in order for Kisor et. to 'select' the correct pixel pattern from the pattern sets, some sort of comparison or 'test' between the number of black pixels in the pixel pattern and block pixel count file is inherently performed", it is respectfully submitted that the claims call for comparing pixel tiles.  Kisor et al. does not disclose comparing pixel tiles to reference tiles, and it is respectfully submitted that the Office Action recognizes this.  In particular, while the office action contends that the original precompressed pixel blocks correspond to the recited N-pixel tiles, the Office Action contends that Kisor et al. teaches comparing pixel counts, which does not address the claimed recitation of comparing an N-pixel tile to a corresponding N-pixel reference tile that comprises a half-toned binary pattern that would be produced by the predetermined half-toning procedure for such N-pixel tile if the portion of a pre-half-toned data that resulted in such N-pixel tile were of uniform lightness.  Kisor et al. clearly does not teach comparing a tile to a reference tile that comprises a half-toned binary pattern that would be produced by the predetermined half-toning procedure for such N-pixel tile if the portion of a pre-half-toned data that resulted in such N-pixel tile were of uniform lightness.

Reconsideration is respectfully requested.

No additional fee is believed to be required for this response.  However, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025.  This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

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If the Examiner considers telephone contact advantageous to the disposition of this case, please call Applicant's attorney, Manuel Quiogue at (585) 423-4309. The undersigned would be happy to discuss any Examiner-proposed amendments as may be appropriate.

Respectfully submitted,

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October 18, 2006

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